

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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MANUEL REYNOSO and LUIS RODRIGUEZ,
individually and on behalf of others similarly situated,

Plaintiffs,

-against-

Docket No. 1:20-cv-03010 (BMC)

JACK'S EGGS AND OTHER INGREDIENTS LLC
(D/B/A JACK'S EGG FARM), JACK NEUSTADT,
and MORDECAI NEUSTADT,

Defendants.

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VOIR DIRE REQUEST

Defendants request the court to examine the jury on the following questions:

1. Is or was any member of the jury an employee, shareholder, agent, or in any manner connected with Jack's Egg Farm?
2. Do any of you know Messrs, Reynoso, or Rodriguez?
3. Has any member of the jury read and been influenced by advertisements sponsored by Jack's Egg Farm?
4. The Plaintiffs in this case are represented by the Law Offices of Michael Faillace, by Clela Errington and Michael A. Faillace. The Defendants are represented by Meltzer, Lippe, Goldstein & Breitstone, LLP, by Richard Howard. Do any of you know any member of either firm on a social or professional basis? Have any of you or a member of your family ever been represented by either attorney or law firm?
5. I am going to read you a list of witnesses who may be called during this trial. Please raise your hand if you know any of these persons.

6. Have any of you or your immediate family ever been a party to a civil lawsuit? Which side? When? What type of litigation?
7. Do any of you have a pending claim or pending lawsuit in Federal or State Court? Do any of you have a pending claim that may result in a lawsuit? Describe the claim.
8. Starting with Juror number 1, please stand and answer the questions as I ask them:
 - (1) Name;
 - (2) What part of city or district do you live in?
 - (3) Your level of education;
 - (4) Your occupation and employer for the last five years;
 - (5) Your spouse's name;
 - (6) Your spouse's occupation for the last five years;
 - (7) Whether there is any reason you know of why you could not fairly and impartially sit as a juror?
 - (8) Do any of you know any of the other jurors?
9. How many of you have served on a jury before? Was that a civil jury? Criminal jury? When?
10. Do each of you understand that this is a civil case which is to be decided by the preponderance of the evidence? Do you understand that this is different from a criminal case where the government has to prove its case beyond a reasonable doubt?
11. Do you understand that you are to wait until the evidence has been presented and you have been instructed as to the law before making up your minds as to any fact or issue in the case? Do any of you feel that because of past experiences or for any other reason that you cannot be fair or impartial to each party in considering the case or could not or

would not be able to follow the law as I will explain it to you later? Do any of you have any other reason such as a health problem or physical problem or home problem that might interfere with your serving as a fair and impartial juror in this case?

12. I have briefly described the nature of this case. Have any of you or any members of your family or close friends ever been involved in any employment litigation. By this I mean a case between an employer and one or more employees. It could have involved allegations of discrimination, harassment, or improper payment of wages.
13. Does any member of the jury have any ideas concerning the credibility of Hasidi/Orthodox Jews or Jews in general? Latinos?
14. Does any member of the jury consider employees more credible than employers or vice-versa?
15. Should the Judge advise you that a person caught lying once is more likely to lie again, would any member of the jury have any difficulty accepting such a rule of law?

Respectfully Submitted,
MELTZER, LIPPE, GOLDSTEIN & BREITSTONE, LLP

/s/ Richard M. Howard
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